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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Michael Katz-Lacabe and Dr. Jennifer
Golbeck, on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

ORACLE AMERICA, INC., a corporation
organized under the laws of the State of
Delaware,

Defendants.

Case No. 3-22-cv-04792-RS

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR ORACLE'S
ANSWER TO PLAINTIFFS' SECOND
AMENDED COMPLAINT**

Judge: Hon. Richard Seeborg

Current Deadline: May 3, 2024
Proposed Deadline: May 17, 2024

Date Action Filed: August 19, 2022
Trial Date: Not set

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Pursuant to Civil Local Rule 6-2(a), Plaintiffs Michael Katz-Lacabe and Dr. Jennifer Golbeck and Defendant Oracle America, Inc., by and through their attorneys of record, stipulate as follows:

WHEREAS, on April 3, 2024, the Court granted Oracle's motion to dismiss portions of the Second Amended Complaint ("SAC") (ECF No. 114);

WHEREAS, Oracle's deadline to answer all non-dismissed claims in the SAC is 30 days after the Court's order on Oracle's motion to dismiss, or May 3, 2024 (ECF No. 83);

WHEREAS, the parties have agreed to mediate this matter on April 24, and further agree that an extension of the answer deadline will facilitate that process (Declaration of Purvi G. Patel ("Patel Decl.") ¶ 2);

WHEREAS, the parties met and conferred on April 16, and agreed, in light of the foregoing, to extend the deadline for Oracle to file its answer to the SAC by two weeks, up to and including May 17 (*id.*);

WHEREAS, in light of the foregoing, in the event Plaintiffs seek an extension of the current class certification briefing deadline, Oracle will agree to a commensurate two-week extension;

WHEREAS, the parties have previously stipulated six times to extend deadlines in this case (ECF Nos. 21, 50, 52, 59, 82, 105), each of which the Court approved (ECF Nos. 22, 51, 53, 60, 83, 106) (Patel Decl. ¶ 3);

NOW THEREFORE, the parties hereby stipulate and agree, subject to the approval of the Court, that Oracle's deadline to answer all non-dismissed claims in SAC shall be extended by 14 days, up to and including May 17, 2024.

Dated: April 18, 2024

MORRISON & FOERSTER LLP

By: /s/ Purvi G. Patel

Purvi G. Patel

***Attorneys for Defendant
Oracle America, Inc.***

1 Dated: April 18, 2024

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ECF ATTESTATION

I, Purvi G. Patel, am the ECF User whose ID and password are being used to file this **JOINT STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINE FOR ORACLE’S ANSWER TO PLAINTIFFS’ SECOND AMENDED COMPLAINT.** In accordance with Civil L.R. 5-1(h)(3), concurrence in and authorization of the filing of this document has been obtained from David Rudolph, counsel for Plaintiffs, and I shall maintain records to support this concurrence for subsequent production for the Court if so ordered or for inspection upon request by a party.

Dated: April 18, 2024

MORRISON & FOERSTER LLP

By: /s/ Purvi G. Patel
Purvi G. Patel

***Attorneys for Defendant
Oracle America, Inc.***

ORDER

Pursuant to the parties' stipulation, the Court hereby orders that:

1. Oracle's deadline to answer all non-dismissed claims in SAC shall be extended by 14 days, up to and including May 17, 2024.

IT IS SO ORDERED.

Dated: April 19, 2024



Honorable Richard Seeborg
United States District Court Judge